

Eric F. Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-05-05
Phase 1 Soil Investigation Data and Proposed Phase 2 Soil Investigation Activities

Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated September 11, 2007. With this letter, the EPA approves this document with the enclosed modifications. The enclosed modifications shall be incorporated in the referenced document and copies provided to the notification list within 30 days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller, P.E.
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)
Barbara Nann (6RC-S)

Miller:10/11/07:L:\Superfund\oversight\gulfco phase 2 soil plan.doc

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6SF-RA

Gulfco Marine Maintenance Superfund Site (Site)

Modifications:

1. (Western Extent of Contamination Evaluation, p. 2): The preliminary screening values used to assess the western extent of contamination were from the RI/FS Workplan Table 15, which includes the commercial/industrial exposure scenario. Since the future sampling being evaluated is for an adjacent property outside of the Gulfco property, the perimeter samples shall be evaluated based on the off-site exposure table (residential exposure scenario), which is Table 16 in the RI/FS Workplan.
2. In conjunction with delineating the western horizontal extent of soil contamination, the vertical extent shall also be investigated for those additional grids that border Column A grids with exceedences of the Preliminary Screening Values (PSVs) at a depth of 1 - 2-feet below ground surface (bgs). The additional grids adjacent to and west of Grids SA1, SA2, and SA3 shall be investigated to a total depth of 5-feet bgs (or 1 foot above the saturated zone).
3. (Vertical Extent of Contamination Evaluation, p. 3): Although location SG5SB59 was saturated at a depth of 1.6-feet bgs during a previous investigation, this location shall be added to Table 5 in the event that the location is no longer under saturated conditions.
4. (NE3MW05/NE3SB09 Area Samples, p. 4): The samples collected from proposed soil borings in the suspected debris areas, and area south of Fresh Water Pond, shall include analysis for hexavalent chromium.
5. (Tables 1 and 2, Evaluation Comparison Values): The PSV for iron is listed as 230,000 mg/kg in both tables. The value in Table 1 shall be 53,000 mg/kg as previously proposed based on the revised reference dose for iron and residential exposure scenario. For Table 2, the EPA Region 6 Soil Screening Criteria for the industrial worker scenario is 100,000 mg/kg, which shall be used.
6. (Table 5, Proposed Soil Sample Analysis): for sample locations L20SB01 through L20SB04, the proposed analyte list is different for the 0 - 0.5-foot sample and the 1 - 2-foot sample at each location. The proposed analyte list was based on the nearby sample PSV exceedences for those depths. Since these depth intervals were arbitrary (meaning there is no soil-type break or consistent layering between the two sample depths to guide the sampling intervals) and the soils may have been reworked over the years, and since the RI/FS Workplan provides for a follow-on sample to be analyzed for the PSV exceedences in the adjacent samples, the follow-on samples shall be analyzed for all PSV exceedences in the adjacent samples regardless of whether the exceedences occurred in the 0-0.5-foot depth or the 1 - 2-foot depth. Therefore, the analyte list for a given location will be the same for each of the sampled depths.
7. (Table 5, Proposed Soil Sample Analysis): The following analytes shall be included in addition to the listed ones, and the additional analytes in accordance with comments 1 and

2 above, since these analytes were detected above the PSV in at least one of the adjacent samples as follows:

- Sample location L20SB03: benzo(a)anthracene and indeno(1,2,3-cd)pyrene (adjacent samples SA2SB16 and SA1SB15).
- Sample location L20SB04: barium and chromium (adjacent samples SA4SB18, SA2SB16, and SA3 SB17).
- Sample location L20SB05: arsenic and molybdenum (adjacent samples SA4SB18, SA5SB19).
- Sample location L20SB06: barium (adjacent samples SA4SB18, SA5SB19).
- Sample location L20SB06: collect samples from grid 06 and analyze for PSV exceedences as per RI/FS Workplan Table 16 in adjacent samples SA5SB19 and SA6SB20.